

May 20, 1988

CD-88-06 (ALL)

Dear Manufacturer:

SUBJECT: Update of Abbreviated Certification Review Guidelines

This letter documents the Abbreviated Certification Review (ACR) practices assumed by the manufacturers under the provisions of 40 CFR 86.080-12. The last published listing of ACR guidelines was in our October 26, 1981 letter. Since that time, EPA has revised the ACR guidelines in an ongoing process. Manufacturers have been notified of updates through individual letters, team contacts, industry meetings, and other similar means. This letter compiles those separate guidelines into a single document and adds four new items for self-determination under the ACR procedure. A complete listing of ACR guidelines is contained in Enclosure I. Enclosure II is a listing of self-determination practices directly authorized by the regulations.

The ACR guidelines identified by this letter summarize the self-determinations manufacturers may make without obtaining a prior judgment from EPA. EPA will spot check manufacturers' self-determinations to assure that regulatory requirements are being met as intended by 40 CFR 86.080-12. If an audit reveals that requirements are not being met, the Certification Division may recommend not to issue a certificate of conformity, or, if the certificate has already been issued, may recommend invalidating the certificate. If there is any question as to how to proceed with any self-determination, manufacturers should obtain advice from EPA prior to proceeding.

The regulations at 40 CFR 86.080-12(a)(3)(iii) require the manufacturer to maintain records of all self-determinations for EPA inspection at EPA's discretion. For some self-determinations specified in the enclosures to this letter, EPA is requesting in advance that reports be sent to EPA.

The enclosed guidelines (Enclosures I and II) compile the current self-determinations with a few revisions from the list included in our October 26, 1981 manufacturer letter. There are two changes to the carryover/carry-across ACR guidelines. First, manufacturers must notify EPA of all self-determinations. Second, manufacturers must obtain EPA concurrence for carryover/carry-across when there are changes to the maintenance schedule involving emission-related components.

Our July 25, 1987 guidance letter (CD-85-11) outlines the specific details on carryover allowances. Enclosure I reflects the changes to the maintenance regulations for the 1988 model year (specifically, the three items listed on page 2 and 3 of Enclosure I).

The following list identifies those self-determinations added since our last published compilation on October 26, 1981:

1. Manufacturers may determine exemption of vehicles from sale at high or low altitudes (Ref: 40 CFR 86.085-8(h) and 40 CFR 86.085-9(g)).
2. Under the Alternative Durability Program, EPA will allow manufacturers to determine d.f.'s which are greater than the minimum determined d.f. value (Ref: 40 CFR 86.085-13(c)(2)).
3. Small-volume manufacturers may select their own emission-data vehicles (Ref: 40 CFR 85.084-14(c)(7)(i)(A)(1), (2), and (3)). This is directly authorized by the regulations, but was not included in the October 26, 1981 guidance letter.
4. EPA no longer requires submission of preliminary applications.
5. Projected U.S. sales data are no longer required to be submitted to EPA as part of the certification application.
6. EPA no longer requires preliminary submission of proposed test equipment and fuel usage.
7. Manufacturers may self-determine their evaporative test procedures.
8. Manufacturers may determine their own road-load horsepower (Ref: Advisory Circular No. 55C).
9. Under the provisions of Advisory Circular No. 72A, manufacturers may determine their own non-survey based shift points. However, if manufacturers use shift points based on surveys, the surveys still require EPA concurrence.
10. Under the provisions of Advisory Circular No. 83A, manufacturers may determine their own data substitutions and engine code equivalencies.
11. Manufacturers may determine their own interior volumes and vehicle classifications (Ref: Advisory Circular No. 83A).

The following four new self-determinations are being added for the first time and will be implemented starting with the 1990 model year (manufacturers may use them immediately on a voluntary basis):

1. Manufacturers may determine their own high-altitude performance adjustment exemptions (Ref: 40 CFR 86.1603(b)).
2. Manufacturers may determine their own high-altitude performance adjustment waivers (Ref: 40 CFR 86.1603(c)).
3. Manufacturers may determine their own high-altitude performance adjustment instructions (Ref: 40 CFR 86.1603(d)).
4. Manufacturers may determine their own car line and truck line, meeting the requirements of Advisory Circular No. 89.

If you have any questions, please contact your team representative.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosures

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